IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OKLAHOMA

[1] MARTHA DONELSON and)	
[2] JOHN FRIEND, ON BEHALF)	
OF THEMSELVES AND ON)	
BEHALF OF ALL SIMILARLY)	
SITUATED PERSONS,)	Case No. 14-CV-316-JHP-TLW
)	
Plaintiffs,)	
)	
v.)	
)	
[1] UNITED STATES OF AMERICA,)	
DEPARTMENT OF INTERIOR,)	
BUREAU OF INDIAN AFFAIRS, et al.,)	
)	
Defendants.)	

DEFENDANTS SULLIVAN AND COMPANY, LLC, ORION EXPLORATION, LLC, SPYGLASS ENERGY GROUP, LLC, AND BGI RESOURCES, LLC MOTION TO DISMISS

Defendants, Sullivan and Company, LLC, Orion Exploration, LLC, Spyglass Energy Group, LLC, and BGI Resources, LLC (collectively referred to as "Moving Defendants"), move to dismiss all claims asserted in Plaintiffs' Amended Complaint.

In the interest of judicial economy and efficiency, Moving Defendants adopt and incorporate by reference, as if set forth verbatim herein, the following motions to dismiss which have recently been filed by other Defendants in this matter: *Motion to Dismiss Plaintiffs' First Amended Complaint* [Doc. 46] [Doc. 124]; Defendants Devon Energy Production Co., L.P. and Linn Energy Holdings, LLC's Motion to Dismiss and Brief in Support [Doc. 136]; Defendants The Link Oil Company and Toomey Oil Company Inc.'s Motion to Dismiss and Brief in Support Thereof [Doc. 137]; and Motion to Dismiss and Brief in Support submitted by Defendants Performance Energy Resources, LLC, Short Oil, LLC, Marco Oil Company, LLC, Osage Energy Resources, LLC, Helmer Oil Corp., and Clear Mountain Production, LLC [Doc. 138], (collectively referred to as the "Motions to Dismiss").

For the reasons set forth in the Motions to Dismiss, Moving Defendants pray that this Court

enter an order dismissing Plaintiffs' Amended Complaint in its entirety, and for such other relief as may be just and equitable.

DATED: October 7, 2014.

/s/ Brian T. Inbody
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ENERGY GROUP, LLC, and BGI RESOURCES, LLC

CERTIFICATE OF SERVICE

binbody@mcnamlaw.com

I hereby certify that on this 7th day of October, 2014, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System and transmittal of a Notice of Electronic Filing to all persons who have entered their appearance as ECF registrants in this case.

Bruce Wayne Robinett, Carol Jean Allen, Cathryn Dawn McClanahan, Charles Greenough, Charles Michael Copeland, Christina Marie Vaughan, Donald A. Lepp, Frederic Dorwart, Garry Michael Gaskins, II, Gentner Frederick Drummond, Gerald Lynn Hilsher, Gregory Don Nellis, Guy Clark, Jack H. Santee, James Martin Chaney, Jean Michael Medina, Jess Morgan Kane, Laura J. Long, Mary Quinn-Cooper, Miriam LeeAnn Sweetin, Nicholas Vernon Merkley, Paul DeMuro, Rick Don Tucker, Robert Charles Mathes, Robert Joseph Joyce, Scott VanBrunt Morgan, Stephen Richard Terrell, Thomas M. Ladner, Timothy James Bomhoff, Wendy Poole Drummond, Wyn Dee Baker; Randall G. Vaughan; Lee I. Levinson.

/s/ Brian T. Inbody